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7	Attorneys for Complainant	
8	DEFADE THE	
9	BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS	
10	STATE OF CAL	IFORNIA
11	In the Matter of the Accusation Against:	Case No. 2007-312
12	BEVERLY S. GRIFFIN	
13	25849 Delphinium Ave. Moreno Valley, California 92553	ACCUSATION
14	Registered Nurse License No. 402983	
15	Respondent.	
16		
17	Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:	
18	<u>PARTIES</u>	
19	1. Complainant brings this Accusation solely in her official capacity as the Executive	
20	Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.	
21	2. On or about August 31, 1986, the Board issued Registered Nurse License Number	
22	402983 ("license") to Beverly S. Griffin ("Respondent"). The license will expire on	
23	July 31, 2008, unless renewed.	
24	<u>JURISDICTION</u>	
25	3. Business and Professions Code ("Code") section 2750 provides, in pertinent part,	
26	that the Board may discipline any licensee, including a licensee holding a temporary or an	
27	inactive license, for any reason provided in Article 3 (commencing with section 2750) of the	
28	Nursing Practice Act.	

STATUTORY PROVISIONS

4. Code section 2761 states, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for the following:

- "(a) Unprofessional conduct. . .
- " ,
 - 5. Code section 2762 states:

"In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

"....

"(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any hospital, patient, or other record pertaining to the substances described in subdivision (a) of this section."

COST RECOVERY

6. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

DRUGS

7. "Demerol," a brand of meperidine hydrochloride, a derivative of pethidine, is a Schedule II controlled substance as designated by Health and Safety Code section 11055(c)(17).

FIRST CAUSE FOR DISCIPLINE

(Falsified, Made Incorrect or Inconsistent Entries In Hospital or Patient Records)

8. Respondent is subject to discipline under Code section 2761(a), on the grounds of unprofessional conduct as defined in Code section 2762(e), in that between February 23, 2004, and February 27, 2004, while employed as a registered nurse at HealthSouth Glenwood Surgery Center, Riverside, California, Respondent falsified, made grossly incorrect,

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respects:

Patient A:

a. On or about February 27, 2004, at 1000 hours, Respondent signed out
(2) 50 mg. doses of Demerol for administration to patient A. Respondent charted the
administration of 25 mg. at 1025 hours and again at 1030 hours, but failed to chart or otherwise
account for the disposition of the remaining 50 mg. of Demerol in any hospital or patient record.

grossly inconsistent or unintelligible entries in hospital or patient records in the following

b. On or about February 27, 2004, at 1100 hours, Respondent signed out (1)
50 mg. dose of Demerol for administration to patient A, but failed to chart or otherwise account for the disposition of the medication in any hospital or patient record.

Patient B:

c. On or about February 27, 2004, at 1200 hours, Respondent signed out (2) 50 mg. doses of Demerol for administration to patient B. Respondent charted the administration of 75 mg., but failed to chart or otherwise account for the disposition of the remaining 25 mg. of Demerol in any hospital or patient record.

Patient C:

d. On or about February 27, 2004, at 1200 hours, Respondent signed out
(1) 50 mg. dose of Demerol for administration to patient C. Respondent wasted 25 mg., but
failed to chart or otherwise account for the disposition of the remaining 25 mg. of Demerol in any hospital or patient record.

Patient D:

e. On or about February 24, 2004, at 1545 hours, Respondent signed out

(2) 50 mg. doses of Demerol for administration to patient D when the physician's order called for

(1) 50 mg. dose of Demerol. Respondent charted the administration of 50 mg. of Demerol, but
failed to chart or otherwise account for the disposition of the remaining 50 mg. of Demerol in any
hospital or patient record. In addition, Respondent administered the medication between 1400
and 1415 hours, which is approximately one hour and forty-five minutes prior to signing out the
medication.

Patient E:

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f. On or about February 23, 2004, at 1630 hours, Respondent signed out

(2) 50 mg. doses of Demerol for administration to patient E when the physician's order called for

(1) 50 mg. dose of Demerol. Respondent charted the administration of 50 mg. of Demerol, but
failed to chart or otherwise account for the disposition of the remaining 50 mg. of Demerol in any
hospital or patient record. In addition, Respondent charted administering the medication between

1210 and 1225 hours, which is approximately four and a half hours prior to signing out the
medication.

Patient F:

g. On or about February 24, 2004, Respondent signed out (2) 50 mg. doses of Demerol at 0945 hours, and (2) 25 mg. doses of Demerol at 1000 and again at 1115 hours, totaling 200 mg. of Demerol. Respondent charted administering 75 mg. of Demerol, but failed to chart or otherwise account for the disposition of the remaining 125 mg. of Demerol in any hospital or patient record. In addition, Respondent charted administering the medication between 0935 and 1000 hours, which is approximately fifteen minutes prior to signing out the medication.

Patient G:

h. On or about February 24, 2004, at 1145 hours, Respondent signed out

(3) 50 mg. doses of Demerol for administration to patient G. Respondent charted the
administration of 100 mg. of Demerol, but failed to chart or otherwise account for the disposition
of the remaining 50 mg. of Demerol in any hospital or patient record.

Patient I:

i. On or about February 24, 2004, Respondent signed out (2) 50 mg. doses of Demerol at 1330 hours, and (1) 50 mg. dose of Demerol at 1448 hours, totaling 150 mg. of Demerol when the physician's order called for (1) 50 mg. dose of Demerol. Respondent charted administering 100 mg. of Demerol, but failed to chart or otherwise account for the disposition of the remaining 50 mg. of Demerol in any hospital or patient record.

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1 Patient J: 2 i. On or about February 26, 2004, at 1600 hours, Respondent signed out (2) 50 mg. doses of Demerol for administration without a physician's order therefor. Thereafter, 3 Respondent failed to chart the administration of the medication or otherwise account for the 4 5 disposition of the medication in any hospital or patient record. 6 Patient K: 7 k. On or about February 26, 2004, Respondent signed out (2) 50 mg. doses of Demerol at 1545 hours, and (2) 50 mg. dose of Demerol at 2015 hours, totaling 200 mg. of 8 Demerol when the physician's order called for (1) 100 mg. dose of Demerol. Respondent wasted 9 50 mg. of Demerol, and charted administering 100 mg., but failed to chart or otherwise account 10 for the disposition of the remaining 50 mg. of Demerol in any hospital or patient record. 11 12 PRAYER 13 WHEREFORE, Complainant requests that a hearing be held on the matters herein 14 alleged, and that following the hearing, the Board of Registered Nursing issue a decision: 15 Revoking or suspending Registered Nurse License Number 402983, issued to 1. Beverly S. Griffin; 16 Ordering Beverly S. Griffin to pay the Board of Registered Nursing the reasonable 17 2. costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and, 18 3. Taking such other and further action as deemed necessary and proper. 19 6-25-07 DATED: 20 21 H ANN TERRY, M.P.H., R.N. 22 Executive Officer 23 Board of Registered Nursing Department of Consumer Affairs 24 State of California Complainant 25

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